

Speaking purely as a consumer of wireless services, having no financial interests in the industry, it is my opinion that the public interest would be best served if the Commission were to realize that there will really be no “Mom & Pop” 3G carriers. It’s time to acknowledge that wireless market is a national one. Because the designated 3G spectrum is discontinuous, it may be difficult for manufacturers to construct instruments that operate throughout all the US and international 3G allocations. In the interest of maximizing domestic and international compatibility, I suggest that the Commission make the license regions as large as possible. I would suggest the following five license areas:

1. “Lower 48” states including the EEZ.
2. Alaska & EEZ
3. Hawaii & EEZ
4. Puerto Rico, USVI their EEZ
5. Guam, Samoa and their EEZs

Large license areas would also allow for economical quick roll-out of coverage by use of high-altitude aircraft as antenna platforms.

However, in order to maximize competition, I suggest the available spectrum be divided into 10 MHz licenses and auctioned with restrictions on the number of licenses any one carrier may hold in each area, with the goal of having at least three 3G carriers in each area. The presumption would be that these three carriers would probably be existing wireless carriers.